

AKIN, GUMP, STRAUSS, HAUER & FELD, L.L.P.

ATTORNEYS AT LAW

A REGISTERED LIMITED LIABILITY PARTNERSHIP
INCLUDING PROFESSIONAL CORPORATIONS

1333 NEW HAMPSHIRE AVENUE, N.W.

SUITE 400

WASHINGTON, D.C. 20036

(202) 887-4000

FAX (202) 887-4288

4377

WRITER'S DIRECT DIAL NUMBER (202) 887-_____

2100 FRANKLIN PLAZA

111 CONGRESS AVENUE

AUSTIN, TEXAS 78701

(512) 499-6200

1500 NATIONSBANK PLAZA

300 CONVENT STREET

SAN ANTONIO, TEXAS 78205

(210) 270-0800

1900 PENNZOIL PLACE-SOUTH TOWER

711 LOUISIANA STREET

HOUSTON, TEXAS 77002

(713) 220-5800

4100 FIRST CITY CENTER
1700 PACIFIC AVENUE
DALLAS, TEXAS 75201-4618
(214) 969-280065 AVENUE LOUISE, P.B. NO. 7
1050 BRUSSELS, BELGIUM
(011) 32-2-535.29.11

September 2, 1993

BY HAND DELIVERYMr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Stop Code 1170
Washington, D.C. 20554

RECEIVED

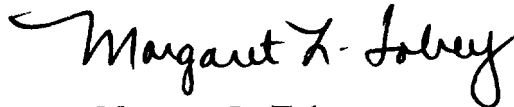
SEP - 2 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARYRe: Petition To Amend Television Table of Allotments

Dear Mr. Caton:

Enclosed for filing on behalf of Broad Spectrum Communications, Inc. pursuant to Section 1.420 of the Commission's Rules, 47 C.F.R. § 1.420 (1992), are the original and four copies of a Petition to Amend the Television Table of Allotments (47 C.F.R. § 73.606). Questions or correspondence with respect to this matter should be addressed to the undersigned.

Very truly yours,



Margaret L. Tobey

Enclosures

 No. of Copies rec'd 074
 List A B C D E

ORIGINAL
RECEIVED

BROAD SPECTRUM COMMUNICATIONS, INC.
5421 BAY CREEK DRIVE
LAKE OSWEGO, OR 97035
(503) 620-0994

SEP - 2 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

September 1, 1993

Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Atten: Allocations Branch

Petition to Amend the Table of Allotments (73.606b)
Substitute Channel 9+ for Channel 14- at Walla Walla, WA

Broad Spectrum Communications, Inc., (BSCI) requests that the FCC amend the Table of Allotments, FCC Rule 73.606b, to substitute VHF Channel 9+ for the currently fallow allotment of UHF Channel 14- at Walla Walla, WA. Channel 9+ can be allocated to Walla Walla in full compliance with current FCC rules. BSCI will apply for a construction permit in a timely manner should the FCC amend the Table of Allotments.

I. ATV Freeze

Walla Walla is located at a distance greater than 305 km (190 miles) from major markets as defined under the "ATV Freeze." Therefore, the freeze on allocations does not apply.

II. Allocation Conditions

Channel 9+ can be allotted to Walla Walla, WA consistent with the minimum distance separation requirements of Sections 73.610 of the Commission's Rules. An allocation study is attached as Exhibit 1.

III. Reasons for Substitution

BSCI believes that it is in the public interest to substitute Channel 9 for Channel 14 for the following reasons:

- 1) A VHF station is less expensive to operate than a UHF station for comparable coverage.
- 2) The capital investment in a VHF station is less than a UHF station for comparable coverage.
- 3) Channel 14 is adjacent to land mobile communications, and therefore, causes interference to which is costly to eliminate and causes disruption to both services.

- 4) Walla Walla, WA is in a rural part southeast Washington. The population is scattered across a larger area. A VHF signal will travel a greater distance than a UHF signal and provide better service to the wider area.

In conclusion, a VHF station that is on the air in Walla Walla will be a greater benefit to the public than a UHF station that will remain fallow due to the higher anticipated costs of operation and reduced service area. A VHF station will have a greater chance of commercial success.

IV. Summary

BSCI believes that the public interest would be best served by substituting Channel 9+ for Channel 14- at Walla Walla, WA. BSCI will submit a timely application for construction permit should the FCC allocate Channel 9+ to Walla Walla.

Therefore, the Table of Allotments, FCC Rule 73.606b, should be amended as follows:

Existing:

Walla Walla, WA	14-
-----------------	-----

Proposed:

Walla Walla, WA	9+
-----------------	----

Respectfully submitted,



P. Eric Dausman
President,
Broad Spectrum Communications, Inc.

BROAD SPECTRUM COMMUNICATIONS, INC.
SEPTEMBER 1993

EXHIBIT 1

TV Spacing Study

TITLE: VHF at Walla Walla, WA
Channel 9 Zone II
Database: DW 06/29/93

Latitude: 46-04-08
Longitude: 118-20-24
Safety zone: 120 km

Call	Auth	Licensee name	Chan	ERP	HAAT-m	Latitude	BR-to	Dist.	Req.
City of License	St	FCC File No.	Zone	(kw)	HAMSL	Longitude	-from	(km)	(km)
CKTN-TV	LIC	BC TV BCG SYSTEM LTD	8 +	18.0	471	49-05-30	6.4	338.4	95.70
TRAIL		BC	II	DA		117-49-10	186.8	242.7	CLEAR
KHDT	CP	SCHUYLER BROADCASTING	9 -	177	834	43-45-18	144.7	312.2	304.9
CALDWELL		ID BPCT-820216KF	II	DA	2206	116-05-52	326.3	7.308	CLOSE
Application for License accepted Per FCC release #15443 dated 01/19/93;									
Was KTMW 04/13/92 Per FCC release #180 dated 04/10/92;									
DA: Continental ACP4B(9) @ 0 deg									
KCTS-TV	LIC	KCTS ASSOCIATION	* 9 o	316	252	47-36-58	301.1	348.1	304.9
SEATTLE		WA BLET-881104KE	II		291	122-18-28	118.2	43.23	CLEAR
License Granted 02/28/89									
KCFW-TV	LIC	EAGLE COMMUNICATIONS,	9 -	26.3	850	48-00-48	52.9	371.5	304.9
KALISPELL		MT	II			114-21-55	235.8	66.56	CLEAR
CBUCT	LIC	CANADIAN BCG CORP	9 o	1.85	420	49-31-50	11.0	392.7	304.9
NELSON		BC	II	DA		117-17-58	191.8	87.80	CLEAR
KWSU-TV	LIC	WASH STATE UNIVERSITY	*10 -	120	411	46-51-43	44.9	125.7	95.70
PULLMAN		WA	II			117-10-26	225.8	29.98	CLEAR

>> End of Channel 9 Study <<